



State of Ohio Environmental Protection Agency

Northwest District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Re: Outreach Lab of Cridersville
Notice of Violation
Generator Registration Certificate # 02-G-01208

December 11, 2008

Ms. Daleen Blanchard
Outreach lab of Cridersville
306 Reichelderfer Road
Cridersville, Ohio 45806

Dear Ms. Blanchard:

On November 25, 2008, I, representing the Ohio Environmental Protection Agency (Ohio EPA) conducted an inspection of the Outreach lab of Cridersville (Facility), infectious waste generator number 02-G-01208. The purpose of this inspection was to determine the Facility's compliance with infectious waste regulations outlined in the Ohio Administrative Code (OAC) Rule 3745-27-30 through 36. Kelly Hanes represented the Facility during the inspection.

All infectious waste is segregated at the point of generation. Proper sharps containers with labels are being utilized. Red biohazard bags are being used at the point of generation. The bags are sealed and taken to the storage closet. The storage closet door was not locked; however, it was labeled with international biohazard symbol.

An inspection of the shipping papers indicated that there were no shipping papers since November 2007. Additionally shipping papers that were available for the past three years were missing white copies from 10/03/05, 2/21/07, 5/16/07, 8/08/07, and 11/08/07. In a phone conversation with you on the day of the inspection, you indicated that you had previously used Midwest who was recently purchased by Stericycle. You had thought that during the transition, Outreach lab of Cridersville may have been overlooked as a stop on Stericylces route, and therefore had not had any pickups in a year. However, during the inspection it was observed that the infectious waste tote was a Stericycle tote and only one sharps container was present inside of the tote, indicating that Stericycle had likely done a pickup since the transition.

OAC Rule 3745-27-33(B) states in part: "The treatment shipping paper shall accompany the shipment of untreated infectious wastes that are described on the shipping paper. The treatment shipping paper shall be used when a shipment of infectious waste is transported to an infectious waste treatment facility that is not owned or operated by the generator of the infectious waste. The treatment shipping paper shall:

- (3) be kept on file for a minimum of three years"
- (6) Be returned to the generator within forty-five days of treatment of the waste at a treatment facility. If the copy is not returned then a legible copy of the original shipping paper and a brief letter outlining the generator's efforts to locate the waste shall be submitted to the board of health having jurisdiction and to the Ohio EPA"

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The owner/operator is in violation of OAC Rule 3745-27-33(B)(3) for not having shipping papers on file for shipments since November 2007. The owner/operator is also in violation of OAC Rule 3745-27-33(B)(6) for not ensuring that all shipping papers confirming proper treatment were returned to the facility within 45 days or taking appropriate actions if they could not be located.

Please send either copies of all of the treatment shipping papers for the dates listed or an explanation as outlined in the rule to my attention, to resolve the OAC Rule 3745-27-33(B)(6) violation. Additionally, please send copies of all of the shipping papers for shipments that occurred within the past year or a written explanation as to why shipping papers are not available to my attention, to resolve the OAC Rule 3745-27-33(B)(3) violation. In the future, please ensure that both the generator and treatment verification copies of the shipping papers are kept on file for a minimum of three years.

The infectious waste spill procedures were reviewed and contained all required information, as outlined in OAC Rule 3745-27-30(B)(10).

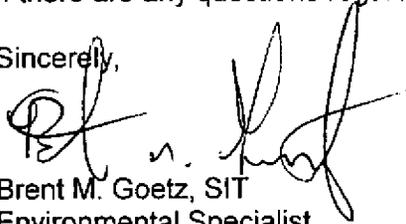
The spill kit was inspected. The kit contained all required materials, as outlined in OAC Rule 3745-27-30(B)(11).

This correspondence addresses specific observations only for the areas of the Outreach lab of Cridersville that were inspected. Nothing present in, nor absent from this correspondence is intended to mean that no other violations existed at the Facility at the time of inspection.

Compliance with the requirements outlined in this letter, or the solid and infectious waste provisions contained in Ohio Revised Code Chapter 3734 and the rules promulgated thereunder, does not relieve the owner/operator from their obligation to comply with other applicable state and federal laws and regulations.

If there are any questions regarding this correspondence, please contact me at (419) 373-4114.

Sincerely,



Brent M. Goetz, SIT
Environmental Specialist
Division of Solid and Infectious Waste Management

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~~pc: File: Auglaize County: Infectious Waste~~

ec: Mike Reiser, DSIWM